CHAMBERS OF JUSTICE K E DOWNES
JUDGES' CHAMBERS
FEDERAL COURT OF AUSTRALIA
119 NORTH QUAY
BRISBANE QLD 4000

The Honorable Mary F. Walrath

United States Bankruptcy Judge

United States Bankruptcy Court for the District of Delaware

824 N. Market Street

Wilmington, DE 19801

Dear Judge Walrath,

Re: Big Digital Infrastructure Group Inc (ARBN 649 261 861) (in liquidation) (formerly Mawson Infrastructure Group)

I am writing to request your co-operation and assistance with facilitating the liquidation of Big Digital Infrastructure Group Inc (ARBN 649 261 861) (in liquidation) (formerly Mawson Infrastructure Group) in Australia (**Big Digital**).

Before identifying the proposed form of assistance, I wish to emphasise some matters:

1. As I understand it, the making of the winding up order in Australia is said to have occurred in violation of the automatic stay which had arisen under United States law, in the sense that the applicants who moved for that order in Australia (**the impugned creditors**) were bound by the automatic stay. However, it is relevant to observe that (a) Big Digital was represented at the hearing in Australia in which the winding up order was made (b) Big Digital did not contend at that hearing that the winding up order could not be made because of a worldwide stay and, in fact, made a positive submission that there was "no automatic stay of the current application".
2. Based on Mr Gray's evidence in the current Australian proceeding which is before me, there are creditors other than the impugned creditors which have claimed debts which Mr Gray considers to be genuine. These creditors were not party to the conduct of the impugned creditors in applying to wind up Big Digital, and are not parties in the current proceeding in your court.
3. Under Australian law, it is in the public interest that liquidations be finalised expeditiously.
4. Under Australian law, in the event that a liquidator has engaged in unlawful or improper conduct, that liquidator can be replaced. However, that does not mean that the liquidation itself comes to an end.
5. Under Australian law, a corporation can come out of liquidation (or the liquidation be terminated), but it can then be placed into liquidation again. Any creditor other than the impugned creditors could have, and can now (if the liquidation is terminated), apply to wind up Big Digital in Australia. It might be said that such an application would have good prospects in circumstances where Big Digital has failed to date to demonstrate that it is able to pay its debts as and when they fall due, and is thereby insolvent.

Paragraph 7 of the Order Dismissing Involuntary Petition dated 4 November 2025 (**Dismissal Order**) made by your Court has the effect of:

(a) providing a basis for Big Digital, by its directors, to refuse to comply with Australian law insofar as that is required for the purposes of compliance with the *Corporations Act 2001* (Cth), and with orders of the Federal Court. This is in circumstances where Big Digital is at least partly responsible for the winding up order being made (see point 1 above);
(b) because of the conduct of the directors of Big Digital, Mr Gray cannot perform his tasks as liquidator, which is causing the Australian liquidation to stall;
(c) the inability for the liquidation to proceed, and the ongoing delay, is prejudicial to the interests of creditors other than the impugned creditors.

For these reasons, I respectfully seek your co-operation. In particular and taking into account the additional circumstances identified above, at least some of which were not before you at the time of the Dismissal Order, I request that Order 7 of the Dismissal Order be vacated, set aside or varied in a manner such that Mr Gray may proceed with the liquidation of Big Digital in Australia without any contention being able to be raised by Big Digital, or its directors, that the liquidation is inconsistent with the Dismissal Order, and with United States law.

In saying this, I recognise that the response to this request will likely turn on whether Mr Gray is held to be in contempt, and that there might be a delay while that is determined.

I would be pleased to discuss this at any time, and I sincerely appreciate your ongoing assistance to date.

Yours faithfully,



Justice K.E. Downes
Chambers
28 August 2026